

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MASSACHUSETTS  
EASTERN DIVISION**

In re:

ASHLEY M. GJOVIK

Debtor.

Chapter 7

Case No. 25-11496 (CJP)

**MOTION FOR ADMISSION PRO HAC VICE (REED C. TRECHTER)**

To the Honorable Christopher J. Panos, Bankruptcy Judge:

Pursuant to Local Bankruptcy Rule 9010-1(a)(3), Andrew M. Troop, a member in good standing of the Bar of the State of Massachusetts and of the United States District Court for the District of Massachusetts, respectfully requests this Court allow Reed C. Trechter of Pillsbury Winthrop Shaw Pittman LLP, 609 Main Street, Suite 2000, Houston, Texas 77002, to appear and practice *pro hac vice* in this bankruptcy case and any related adversary proceedings as counsel for Apple Inc.

Pursuant to Local Bankruptcy Rule 9010-1(a)(3), attached to this motion is the declaration of Reed C. Trechter indicating that: (1) he is a member in good standing in every jurisdiction in which he has been admitted to practice; (2) there are no disciplinary proceedings pending against him as a member of the bar in any jurisdiction; (3) he has reviewed and is familiar with Local Rules of this Court; and (4) he has paid the applicable *pro hac vice* fee to the United States District Court for the District of Massachusetts.

Dated: September 15, 2025

Respectfully submitted,

**PILLSBURY WINTHROP SHAW PITTMAN LLP**

By: /s/ Andrew M. Troop

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***Counsel for Apple Inc.***

**CERTIFICATE OF SERVICE**

I certify that, on September 15, 2025, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the District of Massachusetts and to be mailed by first-class mail postage prepaid, and emailed, to the following parties.

Debtor Ashley M. Gjovik

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Chapter 7 Trustee

HARRIS BEACH MURTHA CULLINA PLLC  
Mark G. DeGiacomo  
33 Arch Street, 12th Floor  
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United States Trustee

Richard King, Asst. U.S. Trustee  
J.W. McCormack P.O. & Courthouse  
5 Post Office Square, 10th Floor, Suite 1000  
Boston, MA 02109  
richard.t.king@usdoj.gov

/s/ Andrew M. Troop

Andrew M. Troop

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**DECLARATION OF REED C. TRECHTER IN SUPPORT OF  
MOTION FOR ADMISSION PRO HAC VICE**

Pursuant to 28 U.S.C. § 1746, I, Reed C. Trechter, declare under penalty of perjury that the following is true and correct to the best of my knowledge and belief:

1. I am an Associate at the law firm of Pillsbury Winthrop Shaw Pittman LLP, counsel of record to Apple Inc. in the above captioned case. I am over the age of eighteen, am of sound mind, and have personal knowledge of the facts contained herein. I submit this declaration in support of the *Motion for Admission Pro Hac Vice* filed by Andrew Troop for leave of Court for my appearance as counsel on behalf of Apple Inc. in this bankruptcy case and any related adversary proceedings.

2. I am admitted to practice in the state courts of Texas, Arizona, and Colorado. I am also admitted to practice in the United States District Courts for the Southern District of Texas and Colorado. I am a member in good standing in every jurisdiction which I have been admitted to practice.

3. There are no disciplinary proceedings pending against me as a member of the bar in any jurisdiction.

4. I have reviewed and am familiar with the Local Rules of this Court.

5. I have paid the applicable *pro hac vice* fee to the United States District Court for the District of Massachusetts.

6. I respectfully request permission to appear as counsel for Apple Inc. in this bankruptcy case and any related adversary proceedings.

Signed September 15, 2025  
Houston, Texas

/s/ Reed C. Trechter

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**ORDER GRANTING MOTION FOR ADMISSION PRO HAC VICE**

Upon the Motion for Admission Pro Hac Vice of Andrew Troop, pursuant to Local Bankruptcy Rule 9010-1(a)(3), to admit Reed C. Trechter of Pillsbury Winthrop Shaw Pittman LLP to practice *pro hac vice* before the United States Bankruptcy Court for the District of Massachusetts, it is hereby ORDERED, ADJUDGED, AND DECREED that:

A. Reed C. Trechter, Pillsbury Winthrop Shaw Pittman LLP, 609 Main Street, Suite 2000, Houston, Texas 77002, may practice and appear *pro hac vice* before this Court in the above referenced bankruptcy case and any related adversary proceeding on behalf of Apple Inc.

B. This Order shall become effective immediately.

SO ORDERED.

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Dated

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Hon. Christopher J. Panos  
United States Bankruptcy Judge